

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,                         )  
   )  
v.   )      Criminal No. 05-CR-30017-MAP  
   )  
CARLOS MARRERO,                                     )  
Defendant   )

**DEFENDANT'S MOTION REQUESTING THAT HE  
BE PRESENT FOR STATUS CONFERENCE  
(assented to)**

Defendant Carlos Marrero ("Marrero") moves the Court for an order that he be transported from the Wyatt Detention Center to federal court in Springfield, Massachusetts for the Initial Status Conference Scheduled for June 2, 2005 at 2:00 p.m. In support of this motion, Marrero states as follows:

1. Marrero has been detained at the Wyatt Detention Center since his arrest on or about April 15, 2005.
2. The Initial Scheduling Conference in this case will be held on June 2, 2005 at 2:00 p.m.
3. The Court's Scheduling Order of April 15, 2005, provides that Marrero will not be transported to Court for the Scheduling Conference absent a showing of exceptional cause.
4. Undersigned defense counsel entered his appearance on May 23, 2005.
5. Undersigned defense counsel has not had an opportunity to discuss with Marrero the potential conflict of interest involved in counsel's appearance before this Court.

6. It will be in the interest of judicial economy to address the conflict and waiver of disqualification with Marrero in open court as soon as possible.

7. Undersigned counsel has discussed this request with Assistant U.S. Attorney Thomas O'Connor, who has assented to the motion.

WHEREFORE, Defendant Marrero respectfully requests that the Court enter an order that he be transported to federal court in Springfield for the Initial Scheduling Conference on June 2, 2005 at 2:00 p.m.

Respectfully submitted,

Dated: May 25, 2005

/s/ C. Jeffrey Kinder  
C. Jeffrey Kinder, BBO# 563890  
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CERTIFICATE OF SERVICE

I, C. Jeffrey Kinder, hereby certify that a true copy of the above document was served upon the attorney of record for each other party by mail/by hand on May 25, 2005.

/s/ C. Jeffrey Kinder  
C. Jeffrey Kinder, Esq.